

REMARKS

Claims 1-2, 5-8, 10-12, 16-18, and 22-32 are pending in the present application. The Examiner rejected claims 1-2, 5-8, 10-12, 16-18, and 22-32 under 35 U.S.C. §103(a).

Claims 1, 10-12, 16-18, 22-24, 28, and 32 were rejected under 35 U.S.C. §103(a) as being obvious over “A Critical Evaluation of Multimedia Toolbook” by Price, *et al.*, in view of U.S. Patent Application Publication No. 2004/0222992 (Calkins, *et al.*), and further in view of U.S. Patent No. 6,321,244 (Liu, *et al.*).

Claims 2, 5, 25-27, and 29-31 were rejected under 35 U.S.C. §103(a) as being obvious over Price in view of Calkins and Liu, and further in view of U.S. Patent No. 6,683,613 (Herbtsman, *et al.*).

Claims 6 and 8 were rejected under 35 U.S.C. §103(a) as being obvious over Price in view of Calkins and Liu, and further in view of U.S. Patent Application Publication No. 2003/0128215 (Kim, *et al.*).

Claim 7 was rejected under 35 U.S.C. §103(a) as being obvious over Price in view of Calkins and Liu, and further in view of U.S. Patent No. 6,075,532 (Colleran, *et al.*).

At the very least, there is no motivation or suggestion to combine Price and Calkins with Liu, and the combination of Price, Calkins, and Liu fails to disclose or suggest *specifying an animation by a computer via a text description, or saving said animation as a Standardized Generalized Markup Language (SGML) file comprising an animation style*, as essentially claimed in claims 1 and 27-32.

The Examiner alleges that Liu teaches storing files or documents as SGML files, citing col. 3, l. 61-62 and col. 2, l. 38-41, and that these passages of Liu teach specifying animation via a text description where the animation file can be saved as a SGML file. The Examiner further alleges that Liu teaches that SGML files are documents that

contain animation data and can be represented as card data, citing col. 3, l. 31-36 and col. 6, l. 10-14.

Applicant urges that the Examiner's interpretation of Liu is incorrect.

Liu is directed to a system that can generate and restructure SGML technical documents into a format referred to as card-based documents, which can include pre-defined animations. The SGML documents involved would be those used to create a technical manual, whereas the card-based documents would be suitable for a slide show training presentation.

In the first set of passages in Liu cited by the Examiner, col. 3, l. 61-62 and col. 2, l. 38-41, the SGML documents are source technical documents, which are different from the SGML animation data files essentially recited in claims 1 and 27-32. Although both documents use SGML syntax, the document type definitions (DTDs) and text content are different. An SGML animation instance follows an animation DTD, which has structural elements that differ from the card-based manual DTD disclosed in Liu and the source document DTD. The card-based DTD and the animation DTD cannot be used interchangeably. The structural elements for the animation have a different semantics from that of Liu's card-based manual. Thus, contrary to the Examiner's assertion in page 3 of the Action, Liu does not teach saving an animation as an SGML file, as a card-based document does not contain an animation.

The second set of passages in Liu cited by the Examiner, col. 3, l. 31-36 and col. 6, l. 10-14, refer to the style specifications, in SGML, for generating card-based documents for source SGML technical documents, which contain information such as header, footer, titles, and auxiliary control for audio, video, animation, etc. The word "style" refers to a card-based document layout, structure, etc. An auxiliary control includes commands such as when to invoke an animation. Applicants claims 1 and 27-32 are directed to how to do an animation by using an SGML animation specification file. Thus, Liu uses SGML to specify information for controlling the animation, not the animation itself. Liu does not disclose or suggest how to do an animation or what

specific animation method should be used. Instead, Liu is directed to generating training documents that can include pre-defined animations. These pre-defined animations would need to be prepared by methods such as those recited in claims 1, 28, and 32. Thus, Liu does not teach or suggest SGML files containing animation data.

Thus, since Liu only teaches SGML for auxiliary control of an animation, and does not teach or suggest using SGML for specifying the animation itself, there would be no motivation or suggestion to combine the teachings of Liu with those of Price and Calkins to produce the inventions recited in claims 1 and 27-30. Further, the combination of Price, Calkins, and Liu do not teach or suggest *saving a SGML file comprising an animation style*, as essentially recited in claims 1 and 27-32. Thus, Applicant urges that since there is no motivation to combine Price, Calkins, and Liu, and since the combination of Price, Calkins, and Liu does not teach or suggest all of the features recited in Applicant's claims 1 and 27-32, a *prima facie* case of obviousness of claims 1 27-32 over the combination of Price, Calkins, and Liu cannot be maintained. Thus, Applicant urges that independent claims 1 and 27-32 are not obvious over Price in view of Calkins and Liu.

Independent claims 27 and 29-31 were further rejected over Herbstman. However, Herbstman does not rectify the deficiencies of Price, Calkins, and Liu as discussed above. Thus, Applicant urges that claims 27 and 29-31 are not obvious over the combination of Price, Calkins, Herbstman and Liu. Reconsideration and withdrawal of these rejections is respectfully requested.

Dependent claims 10-12, 16-18, and 22-24 all depend from claim 1 and are thus patentable for at least the same reasons as claim 1. Reconsideration and withdrawal of these rejections is respectfully requested.

Dependent claims 2 and 5 depend from claim 1. The Examiner cited Herbstman as disclosing *repeating foregoing steps*, as essentially recited in claim 2, and *calculating an new orientation for said animation object and orienting said animation object*, as recited in claim 5. However, Herbstman does not rectify the deficiencies of Price,

Calkins, and Liu as discussed above. Applicant urges that a *prima facie* case of obviousness of claims 2 and 5 over Price, Calkins, Liu and Herbstman cannot be maintained. Reconsideration and withdrawal of these rejections is respectfully requested.

Dependent claims 6 and 8 depend from claim 1. The Examiner cited Kim as disclosing *representing said animation path as a series of sampling points, calculating a deviation, and comparing said deviation with a predetermined limit* as essentially recited in claims 6 and 8. However, Kim does not rectify the deficiencies of Price, Calkins, and Liu as discussed above. Applicant urges that a *prima facie* case of obviousness of claims 6 and 8 over Price, Calkins, Liu and Kim cannot be maintained. Reconsideration and withdrawal of these rejections is respectfully requested.

Dependent claim 7 depends from claim 1. The Examiner cited Colleran as disclosing *forming a bounding box, calculating a new orientation for said bounding box, and orienting said bounding box*, as essentially recited in claim 7. However, Colleran does not rectify the deficiencies of Price, Calkins, and Liu as discussed above. Applicant urges that a *prima facie* case of obviousness of claim 7 over Price, Calkins, Liu and Colleran cannot be maintained. Reconsideration and withdrawal of this rejection is respectfully requested.

CONCLUSION

For the foregoing reasons, Applicant urges that claims 1-2, 5-8, 10-12, 16-18, and 22-32 are in condition for allowance. Early and favorable action on this case is respectfully requested.

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